

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

**Federal Trade Commission**

**Plaintiff,**

**v.**

**Innovative Marketing, Inc., et al.**

**Defendants,**

**AND**

**Maurice D'Souza**

**Relief Defendant.**

**CIVIL NO. RDB 08-CV-3233**

**PLAINTIFF FEDERAL TRADE COMMISSION'S  
UNCONTESTED MOTION TO FILE CERTAIN EXHIBITS UNDER SEAL**

Pursuant to Local Rule 105-11, Plaintiff, the Federal Trade Commission ("FTC"), hereby moves the Court to permit the FTC to file under seal Volumes 8-11 of the Exhibits to Plaintiff's Memorandum in Support of Plaintiff's Motion for Summary Judgment.

In support of its Motion to File Certain Exhibits Under Seal, the FTC states as follows:

1. The FTC is seeking summary judgment against multiple defendants who sold millions of dollars of computer security software to consumers in the United States and other countries.
2. The Defendants' operation utilized a variety of bank accounts, credit cards, card processors, and other financial instruments and institutions in order to process the revenue from consumer sales.
3. In order to present its case for Summary Judgment, it is necessary for the FTC to provide the Court with several volumes of the Defendants' financial documents, thousands of pages of

which have personally identifiable information (“PII”), often LISTED multiple times on each page.

4. It is not feasible to redact every one of the elements of PII displayed within these financial documents, both from a practicality standpoint, and from a security standpoint, since it is likely that some PII would inevitably escape review and become public.

5. Moreover, the probative value of the documents is in the financial information itself, so providing redacted copies renders the exhibits useless to any reviewer.

6. The FTC thus believes there is no alternative but to file these selected exhibits under seal.

7. Counsel for Defendants Kristy Ross and Marc D’Souza do not oppose this motion.

8. The FTC therefore respectfully requests that the Court accept Exhibit Volumes VIII - XI of Plaintiff’s Memorandum of Points and Authorities in Support of Plaintiff’s Motion for Summary Judgment under seal.

Dated: November 19, 2010

Respectfully submitted:  
WILLARD K. TOM  
General Counsel

/s/ Ethan Arenson  
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Federal Trade Commission

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**ORDER GRANTING PLAINTIFF FEDERAL TRADE  
COMMISSION'S UNCONTESTED MOTION TO FILE  
CERTAIN EXHIBITS UNDER SEAL**

Upon consideration of Plaintiff Federal Trade Commission's ("FTC") Uncontested Motion to File Certain Exhibits Under Seal

IT IS HEREBY ORDERED THAT the Plaintiff's Motion is GRANTED.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2010.

\_\_\_\_\_  
**UNITED STATES DISTRICT COURT JUDGE**

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2010, I caused a true and correct copy of the foregoing Uncontested Motion to File Certain Exhibits Under Seal to be served via the Court's electronic filing system upon:

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/s/ Ethan Arenson